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VIA ECF

GRANTED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 264.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: January 17, 2025

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007
(212) 805-0238

Re: *Nike, Inc. v. lululemon usa inc.* (Case No. 1:23-cv-00771-AS)
Letter Motion to File Under Seal

Dear Judge Subramanian:

Defendant lululemon usa, inc. (“lululemon”) respectfully requests leave to file under seal a portion of its Letter Brief Regarding the Construction of “Surrounding Textile Structure.” Specifically, lululemon requests that the Court seal three figures in the Letter Brief that contain information that adidas designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order, and previously requested that the Court seal. *See* D.I. 150-4 at adidas_lululemon_00001365–67 (sealed filing containing the same figures); *see also* D.I. 217 (adidas’ Letter Brief requesting such information be sealed as trade secret manufacturing processes and competitively sensitive business information). The Court granted adidas’ previous request to seal this same information. *See* D.I. 250 at 2-4 (granting requests to seal). Accordingly, for the same reasons as the Court previously sealed this information, lululemon requests that it be sealed in its Letter Brief Regarding the Construction of “Surrounding Textile Structure.” *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 114 (2d Cir. 2006).

lululemon’s Letter Brief Regarding the Construction of “Surrounding Textile Structure” does not contain any of lululemon’s confidential information.

Very truly yours,

/s/ Ali S. Razai
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